

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FOX VALLEY CONSTRUCTION)	
WORKERS FRINGE BENEFIT FUNDS,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 11 C 2795
)	
FREDERICK J. WALKER, individually)	JUDGE EDMOND E. CHANG
and d/b/a DEKALB WALKER)	
CONSTRUCTION CO., INC.,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, FREDERICK J. WALKER, individually and d/b/a DEKALB WALKER CONSTRUCTION CO., INC., in the total amount of \$26,188.75, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,431.25.

On July 5, 2011, the Summons and Complaint was served on the Defendant (by tendering a copy of said documents to his wife) at his residence (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on July 26, 2011. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Cecilia M. Scanlon

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 5th day of August 2011:

Mr. Frederick J. Walker
17610 Illinois Route 23
DeKalb, IL 60115-8866

/s/ Cecilia M. Scanlon _____

Cecilia M. Scanlon
Attorney for Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6288574
Telephone: (312) 236-4316
Facsimile: (312) 236-0241
E-Mail: cscanlon@baumsigman.com